

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DAVE ALEXANDERSON,

Plaintiff,

v.

SCOTT LANGTON, in his individual capacity,  
and CITY OF BLAINE, a municipal  
corporation,

Defendants.

NO. 2:13-CV-01764-JLR

DECLARATION OF THOMAS P.  
MILLER IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT

I, THOMAS P. MILLER, hereby declare as follows:

1. I am over the age of eighteen years and am a citizen of the United States. I have personal knowledge of the facts set forth herein and am competent to testify to them at trial.

2. I am one of the attorneys of records for defendants CITY OF BLAINE and SCOTT LANGTON.

3. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the transcript of the deposition of Timothy Richardson taken on August 26, 2014.

DECLARATION OF THOMAS P. MILLER IN  
SUPPORT OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT  
(2:13-CV-10764 JLR) - 1

**CHRISTIE LAW GROUP, PLLC**  
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SEATTLE, WA 98109  
206-957-9669

1           4.       Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the  
2 transcript of the deposition of Vida Moore taken on September 11, 2014.

3           5.       Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the  
4 transcript of the deposition of Dave Alexanderson taken on July 15, 2014.

5           6.       Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the  
6 transcript of the jury trial in *City of Blaine v. Dave Alexanderson* held in the Blaine Municipal Court  
7 on February 6, 2012.

8           7.       Attached hereto as **Exhibit E** is a true and correct copy of excerpts from the  
9 transcript of the deposition of Scott Langton taken on August 25, 2014.

10          8.       Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the  
11 transcript of the deposition of Niles Roberts, MD taken on September 19, 2014.

12          9.       Attached hereto as **Exhibit G** is a true and correct copy of Blaine Municipal Court  
13 Dockets for Case No. C00011556 and Case No. 1Z0426265 (BLAINE 1472-1476).

14          10.       Attached hereto as **Exhibit H** is a true and correct copy of the Verdict Form in *City*  
15 *of Blaine v. David Alexanderson*, signed on February 6, 2012.

16          11.       Attached hereto as **Exhibit I** is a true and correct copy of the transcript of the  
17 hearing held in Blaine Municipal Court on February 15, 2012 in *City of Blaine v. Dave*  
18 *Alexanderson*.

19          12.       Attached hereto as **Exhibit J** is a true and correct copy of jury instruction number 4  
20 from the jury trial of *City of Blaine v. Dave Alexanderson* held in Blaine Municipal Court on  
21 February 6, 2012 (BLAINE 37).

13. Attached hereto as **Exhibit K** is a true and correct copy of excerpts from the transcript of the deposition of Norm Stamper, Ph.D., taken on September 24, 2014.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

SIGNED in Seattle, Washington this 28<sup>th</sup> day of October, 2014.

CHRISTIE LAW GROUP, PLLC

By /s/ Thomas P. Miller  
THOMAS P. MILLER, WSBA #34473  
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I hereby certify that on October 28, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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